

# KING & SPALDING

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November 17, 2016

**VIA E-MAIL TRANSMISSION  
AND ECF FILING**

The Honorable Martin Glenn  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.  
Case No. 09-50026 (MG)**

**Letter Regarding Update on Related Proceedings**

Dear Judge Glenn:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Judge Gerber’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], and as discussed at the Case Management Conference held on November 16, 2016, we write to update the Court regarding developments in proceedings relating to New GM. Specifically, on November 11, 2016, counsel to New GM filed in MDL 2543 the following pleadings: (i) *Defendant New GM’s Statement of Undisputed Material Facts Pursuant to Local Rule 56.1* [MDL Dkt. No. 3517]; (ii) *Affirmation of R. Allan Pixton* (without exhibits)<sup>1</sup> [MDL Dkt. No. 3518]; (iii) *New GM’s Motion for Partial Summary Judgment on Successor Liability* [MDL Dkt. No. 3519]; and (iv) *Memorandum in Support of New GM’s Motion for Partial Summary Judgment on Successor Liability* [MDL Dkt. No. 3520]. Copies of the pleadings are attached hereto, respectively, as **Exhibits “A” through “D.”**

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<sup>1</sup> The exhibits attached to the *Affirmation of R. Allan Pixton* are voluminous. If the Court would like copies of the exhibits, New GM can provide them to the Court on a disk or flash drive.

Respectfully submitted,

*/s/ Scott Davidson*

Scott Davidson

SD/hs

Encl.

cc: Parties Set Forth On Schedule “1” Annexed Hereto.

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**SCHEDULE 1**

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**Parties to the Motion to Enforce, filed by New GM on June 1, 2016 [Dkt. No. 13634]**

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**Parties to the Motion to Enforce filed by New GM on June 24, 2016 [Dkt. No. 13655]**

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**Parties Subject to the Pilgrim Motion to Enforce**

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